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November 1, 2002

VIA HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue N.E.
Washington, DC 20002

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**Re: Amendment of Section 73.622(b), Table of
Allotments, Digital Television Broadcast
Stations (Belton, Texas)**

Dear Ms. Dortch:

On behalf of Telemundo of Galveston-Houston License Corporation ("telemundo"), licensee of television station KTMD and permittee of digital television station KTMD-DT, please find transmitted herewith for filing **an** original and four copies of Telemundo's "Comments" in the above-referenced proceeding. I have also included a return copy to be date-stamped and returned to this office.

Should you have any questions please contact the undersigned.

Sincerely,

Peter M. Gould

Enclosure

cc: Ms. Pam Blumenthal, Media Bureau

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On September 23, 2002, the Commission released a Report and Order amending the NTSC and DTV Table of Allotments for Galveston, Texas. *Galveston, Texas*, MM Docket No. 02-142, DA 02-2288 (Chief, Video Division, released Sept. 23, 2002). Previously, KTMD had been assigned NTSC Channel 48 and DTV Channel 47. In the Report and Order, the Commission exchanged these assignments, so that effective November 7, 2002, KTMD will be assigned NTSC Channel 47 and DTV Channel 48. As directed in the Report and Order, Telemundo subsequently filed applications for construction permits for the newly assigned channels to implement the change. *See* FCC File No. BPCT-20011217ABL; FCC File No. BMPCDT-20020925ABZ.


Telemundo's application for permanent digital operation on DTV Channel 48 cannot be granted unless Telemundo is also granted authority to move its analog operations to NTSC Channel 47. Telemundo's application for a construction permit on NTSC Channel 47 cannot be granted unless the Commission substitutes DTV Channel 38 for DTV Channel 47c in Belton, Texas.

Accordingly, the substitution of Channel 38 for Channel 47c as proposed in the NPRM will serve the public interest in two ways. The channel substitution will increase the area and population served by KNCT-DT as compared to the original allotment on DTV Channel 47c. The channel substitution also will allow the grant of Telemundo's pending analog and digital permit applications, thereby permitting full digital operation of KTMD--DT on DTV Channel 48, and improving Telemundo's service to the area.

Telemundo therefore urges the Commission to implement the channel substitution as proposed in the NPRM without delay and to modify the authorization for KNCT-DT to operate on Channel 38.

Respectfully Submitted,

TELEMUNDO OF GALVESTON-HOUSTON
LICENSE CORPORATION

By: 
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Its Attorneys

November 1, 2002

CERTIFICATE OF SERVICE

I, Evangula Brown, do hereby certify that on this 1st day of November, 2002 I sent a copy of the foregoing Comments to the persons listed below as follows:

BY U.S. MAIL:

Ernest T. Sanchez, **Esq.**
The Sanchez Law Firm
2000 L Street N.W.
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BY HAND DELIVERY:

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